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October 20, 2020

**BY ELECTRONIC FILING**

Hon. Claude M. Hilton, Senior Judge  
United States District Court  
Eastern District of Virginia – Alexandria  
401 Courthouse Square  
Alexandria, VA 22314

Re: UMG Records, Inc., et al. v. Tofig Kurbanov, et al.  
Case No. 1:18-CV-00957-CMH-TCB  
Our File No. 021773/096773

**Hearing Date: October 23, 2020 – 10:00 a.m.**

Dear Judge Hilton:

In light of the ongoing pandemic, counsel for Mr. Kurbanov requests respectfully that the hearing scheduled for October 23, 2020, on “Plaintiffs’ Motion for Reconsideration of Court’s September 18, 2020 Stay Order” [Doc. 61], be held via tele-conference or video-conference.

In addition to the challenges associated with an in-person hearing, the parties are represented in part by *pro hac vice* counsel, who reside outside of the Eastern District of Virginia. Defense counsel need to participate in the hearing and anticipate that travel under current conditions will be particularly difficult. Defense counsel submits respectfully that holding the hearing remotely will be the safest and most efficient way to ensure that they can participate fully.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jeffrey Geiger', written over the typed name.

Jeffrey H. Geiger

cc: **BY E-MAIL**

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